

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

AMF BOWLING CENTERS, INC.; §
BOWLERO CORP. §
§
Plaintiffs, §
§
vs. § CIVIL ACTION NO. 3:23-cv-00448
§
THOMAS TANASE, §
§
Defendant. §

**NOTICE OF MOTION TO SEAL PORTIONS OF PLAINTIFFS' MEMORANDUM IN
OPPOSITION TO DEFENDANT'S MOTION FOR LEAVE TO FILE COUNTERCLAIM
AND TO ADD AN ADDITIONAL PARTY**

PLEASE TAKE NOTICE THAT, pursuant to Local Civil Rule 5 of the Local Rules of the United States District Court for the Eastern District of Virginia, Plaintiffs AMF Bowling Centers, Inc. and Bowlero Corp. (collectively, “Bowlero”) have filed a Motion to Seal Portions of Plaintiffs’ Memorandum in Opposition to Defendant’s Motion for Leave to File Counterclaim and to Add an Additional Party (the “Motion to Seal”). The specific grounds and authorities in support of the Motion to Seal are set forth in Bowlero’s Memorandum in Support of the Motion to Seal.

Before this Court may seal Court documents, it must: (1) provide notice to the public and give the public an opportunity to object to the sealing; (2) consider less drastic alternatives; and (3) state specific findings in support of a decision to seal and reject alternatives to sealing. *See, e.g., Trustees of Columbia Univ. in City of N.Y. v. NortonLifeLock, Inc.*, 2021 WL 8895279 (E.D. Va. Sept. 29, 2021) (citing *Ashcraft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000)).

In compliance with Local Civil Rule 5 of the Local Rules of this Court and *Ashcraft*, the Court posts the following notice to the public: “This serves as public notice that Bowlero has moved to file under seal portions of its Memorandum in Opposition to Defendant’s Motion for

Leave to File Counterclaim and to Add an Additional Party.” Parties and non-parties may submit memoranda in support of or in opposition to the Motion to Seal, and they may designate all or part of such memoranda as confidential. Any person objecting to the Motion to Seal must file an objection with the Clerk within seven (7) days and if no objection is filed in a timely manner, the Court may treat the Motion to Seal as uncontested. Objections to the Motion to Seal should be filed in the Civil Section of the Clerk’s Office. The Notice will be posted for a minimum of forty-eight (48) hours.”

Dated: April 4, 2024

Respectfully submitted,

**AMF BOWLING CENTERS, INC.
and BOWLERO CORP.**

/s/ Neil S. Talegaonkar

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*Counsel for Plaintiffs AMF Bowling Centers, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of April, 2024, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel for Defendant Thomas Tanase:

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